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Attorneys for Defendant United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IT IS HEREBY STIPULATED by and between the undersigned, subject to the approval of the Court, that (a) the date for the Initial Case Management Conference (currently scheduled for September 5, 2008 at 10:00 a.m.) be continued to **September 19, 2008 at 10:00 a.m.**, (b) the last day to meet and confer about initial disclosures, early settlement, ADR process selection and a discovery plan, as well as the filing of their respective ADR Certifications and Stipulation to ADR Process or Notice of Need for ADR Phone Conference be continued from August 25, 2008 to **September 5, 2008**, and (c) the last day to file a Rule 26(f) Report, complete initial disclosures and file a joint Case Management Conference Statement be continued from September 8, 2008 to **September 12, 2008**.

The stipulation as to changing the date for the Initial Case Management Conference is based on the fact that counsel for defendant will be in South Carolina to attend a training seminar

STIP. AND [PROPOSED] ORDER TO CONTINUE DATES
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1 at the National Advocacy Center between September 2, 2008 and September 5, 2008. This
2 training seminar was scheduled long in advance of the Court's July 22, 2008 Clerk's notice
3 setting the date for the Case Management Conference. *See* Docket No. 12. The stipulation as to
4 the pre-conference filing requirements is based on the stipulated change in the date for the case
5 management conference as well as the fact that Plaintiff's counsel will be in trial out of town for
6 most of the month of August, 2008. The undersigned have begin to discuss certain matters about
7 this case, but need more time to meet and confer and discuss certain matters with their respective
8 clients. The parties do not believe that any prejudice would be caused as a result of this short
9 continuance and submit that no other dates would need to be continued. The original date of the
10 Case Management Conference was continued once by the Court but no other dates have been
11 continued in this case.

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13 DATED: July 28, 2008 By: /s/
14 J. NILEY DORIT
Attorney for Plaintiff

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16 JOSEPH P. RUSSONIELLO
17 United States Attorney

18 DATED: July 28, 2008 By: /s/
19 MICHAEL T. PYLE
Assistant United States Attorney
20 Attorneys for Defendant

21 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

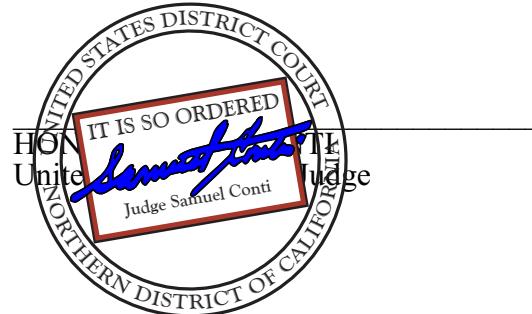
22 The date for the Initial Case Management Conference is continued from September 5,
23 2008 at 10:00 a.m. to **September 19, 2008 at 10:00 a.m.**

24 The last day to meet and confer about initial disclosures, early settlement, ADR process
25 selection and a discovery plan, as well as the filing of their respective ADR Certifications and
26 Stipulation to ADR Process or Notice of Need for ADR Phone Conference is continued from
27 August 25, 2008 to September 5, 2008.

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1 The last day to file a Rule 26(f) Report, complete initial disclosures and file a joint Case
2 Management Conference Statement is continued from September 8, 2008 to **September 12,**
3 **2008.**

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5 DATED: July 28, 2008



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